

FEE TRANSMITTAL

Effective 30 September 2007
Patent fees are subject to annual revision.

Complete If Known

Application Number 10/775249
Filing Date 11 February 2004
First Named Inventor Ji-Sook KIM et al.
Examiner Name Kwasi KARIKARI
Group/Art Unit 2617

TOTAL AMOUNT OF PAYMENT

(\$510.00)

Attorney Docket No.

P57026

METHOD OF PAYMENT (check one)

1. Payment Enclosed:

(CHECK #54481)

☒ Check ☐ Credit Card ☐ Money Order ☐ Other

☐ Charge Any Additional Fee Required Under 37 C.F.R. §1.16 and 1.17.

☐ Applicant claims small entity status. See 37 CFR 1.27

2. The Commissioner is hereby authorized to charge any deficiency and credit any over payments to:

Deposit Account Number: 02-4943

FEE CALCULATION

Fee Code	Fee (\$)	Fee Code	Fee (\$)	Fee Description	Fee Paid
EXTENSION OF TIME FEES					
1251	120	2251	60	Extension for reply within first month	\$
1252	460	2252	230	Extension for reply within second month	\$
1253	1050	2253	525	Extension for reply within third month	\$
1254	1640	2254	820	Extension for reply within fourth month	\$
1255	2230	2255	1115	Extension for reply within fifth month	\$
APPEAL					
1401	510	2401	255	Notice of Appeal	\$
1402	510	2402	255	Filing a brief in support of an appeal	\$510.00
1403	1030	2403	515	Request for oral hearing	\$
CLAIMS					
1201	210	2201	105	Independent claims in excess of 3	\$
1202	50	2202	25	claims in excess of 20	\$
Other Fee (specify) _____					\$
Other Fee (specify) _____					\$
Other Fee (specify) _____					\$

FEE CALCULATION

Fee Code	Fee (\$)	Fee Code	Fee (\$)	Fee Description	Fee Paid
MISCELLANEOUS					
1801	\$810	2801	\$405	Request for continued examination (RCE)	\$
1806	\$180			Submission of an IDS	\$
1814	\$130	2814	\$65	Statutory disclaimer	\$
8021	\$40			Recordation of assignment per property	\$
TRADEMARK					
6001/7001			\$375	Application for registration, per class (paper)	\$
6002/7002			\$100	Amendment to Allege Use, per class	\$
6003/7003			\$100	Statement of Use, per class	\$
6004/7004			\$150	Request for six-month extension of time, per class	\$
6205/7205			\$100	\$8 affidavit, per class	\$
6208/7208			\$200	\$15 affidavit, per class	\$
6201/7201			\$400	Application for renewal, per class	\$
6403/7403			\$100	Ex parte appeal, per class	\$
PETITION					
1462			\$400	Petitions to Director (Group I)	\$
1463			\$200	Petitions to Director (Group II)	\$
1464			\$130	Petitions to Director (Group III)	\$
1452	\$510	2452	\$255	Petitions to revive unavoidably abandoned application	\$
1453	\$1540	2453	\$770	Petitions to revive unintentionally abandoned application	\$
PATENT MAINTENANCE					
1551	\$930	2551	\$465	Due at 3.5 years	\$
1552	\$2360	2552	\$1180	Due at 7.5 years	\$
1553	\$3910	2553	\$1955	Due at 11.5 years	\$
Other Fee (specify) _____					\$
Other Fee (specify) _____					\$
Other Fee (specify) _____					\$

SUBTOTAL: LEFT COLUMN

\$510.00

SUBTOTAL: RIGHT COLUMN

\$0.00

SUBMITTED BY

Typed or Printed Name

Robert E. Bushnell, Esq.

Complete (if applicable)

Reg. Number

27,774

Signature

Date

11 July 2008

Deposit Account User ID

REB/kf

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PATENT
P57026

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF APPEALS AND INTERFERENCES**

In re Application of:

Appeal No. _____

JI-SOOK KIM *et al.*

Serial No.: 10/775249

Examiner: KARIKARI, KWASI

Filed: 11 February 2004

Art Unit: 2617

For: METHOD FOR OPERATING WIRED AND WIRELESS PHONE SERVICES
INTERCONNECTIVELY

TRANSMITTAL OF APPEAL BRIEF FEE

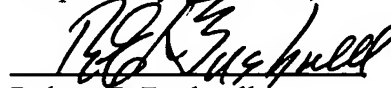
Mail Stop Appeal Brief-Patents

Commissioner for Patents
P.O.Box 1450
Alexandria, VA 22313-1450

Sir:

Accompanying this transmittal is a check drawn to the Commissioner of Patents & Trademarks in the amount of \$510.00 (Check #54481) for filing an Appeal Brief in support of a Notice of Appeal filed on 4 June 2008. Should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Appellants' undersigned attorney in the amount of such fees.

Respectfully submitted,


Robert E. Bushnell
Attorney for Appellants
Reg. No.: 27,774

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Folio: P57026
Date: 11 July 2008
I.D.: REB/kf



PATENT
P57026

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF APPEALS AND INTERFERENCES**

In re Application of:

Appeal No. _____

JI-SOOK KIM *et al.*

Serial No.: 10/775249

Examiner: KARIKARI, KWASI

Filed: 11 February 2004

Art Unit: 2617

For: METHOD FOR OPERATING WIRED AND WIRELESS PHONE SERVICES
INTERCONNECTIVELY

APPEAL BRIEF

Paper No. 19

Mail Stop Appeal Brief-Patents

Commissioner for Patents

P.O.Box 1450

Alexandria, VA 22313-1450

Sir:

Pursuant to Appellants' Notice of Appeal filed on 4 June 2008, Appellants hereby appeal to the Board of Patent Appeals and Interferences from the rejection of claims 21 thru 26, 28 thru 33, 35 and 36 as set forth in the Office action mailed on 4 March 2008 (Paper No. 20080227).

Folio: P57026
Date: 7/11/08
I.D.: REB/JGS/kf

07/14/2008 JADD01 00000050 10775249

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I. REAL PARTY IN INTEREST

Pursuant to 37 CFR §41.37(c)(1)(as amended), the real party in interest is:

Samsung Electronics Co., Ltd.
416, Maetan-dong, Yeongtong-gu
Suwon-si, Gyeonggi-do, 442-742 Republic of KOREA

as evidenced by the Assignment executed by the inventors on 11 February 2004 and recorded by the
U.S. Patent and Trademark Office on 11 February 2004 at Reel 014983, Frame 0862.

II. RELATED APPEALS AND INTERFERENCES

There are no other appeals and no interferences known to Appellant, Appellant's legal representatives or the assignee which will directly affect, be directly affected by, or have a bearing on the Board's decision in the pending appeal.

III. STATUS OF CLAIMS

Claims 21 through 26, 28 thru 33, 35 and 36 are rejected. Of the latter claims, claims 21 and 30 are independent, whereas the remaining claims are dependent.

Claims 1 through 20, 27 and 34 were previously canceled.

Claims 21 thru 26, 28 through 33, 35 and 36 are on appeal.

IV. STATUS OF AMENDMENTS

An Amendment After Final was filed on 10 April 2007 in response to the final Office action mailed on 11 January 2007 (Paper No. 20070108). The Amendment After Final which was filed on 10 April 2007, was entered by the Examiner.

An Amendment After Final was filed on 15 October 2007 in response to the final Office action mailed on 16 July 2007. The Amendment After Final filed on 15 October 2007 was entered upon the filing of a Request for Continued Examination on 13 December 2007.

V. SUMMARY OF CLAIMED SUBJECT MATTER

As recited in independent claim 21, with reference to Figure 3, the invention relates to a system for operating wired and wireless phone services interconnectively, the system comprising: a private base station controller (pBSC) 40 which is connected to a public switched telephone network (PSTN) 10 and a private base station transceiver system (pBTS) 210, and which provides a mobile communication service to a plurality of mobile communication terminals 220, 240, 260; and a group exchange 100 which is connected to the PSTN 10, and which assigns a respective virtual wired phone number to each respective mobile communication terminal 220, 240, 260 existing in a mobile zone 200 as a management region of the pBTS 210, and which provides a public wired phone service to said each respective mobile communication terminal 220, 240, 260 using the respective virtual wired phone number, and which provides a wired phone service to a wired terminal 11 existing outside the mobile zone 200; wherein, when receiving a request for an outgoing service from an internal mobile communication terminal, the group exchange 100 changes a caller identification (CID) into the respective virtual wired phone number assigned to the internal mobile communication terminal, and calls a called terminal via the PSTN 10.

As recited in independent claim 30, with reference to Figure 3, the invention relates to a method for operating wired and wireless phone services interconnectively, the method comprising the steps of: assigning, by a group exchange 100, a respective virtual wired phone number to each respective one of a plurality of mobile communication terminals 220, 240, 260 existing in a mobile zone 200 as a management region of a private base station transceiver system (pBTS) 210;

providing, by the group exchange 100, a wired phone service to a wired terminal 11 existing outside the mobile zone 200; providing, by the group exchange 100, a public wired phone service to the mobile communication terminals 220, 240, 260 by linking the respective virtual wired phone numbers with respective mobile identifier numbers (MINs) of the mobile communication terminals 220, 240, 260; and when the group exchange 100 receives a request for an outgoing service from an internal mobile communication terminal, changing, by the group exchange 100, a caller identification (CID) into the respective virtual wired phone number assigned to the internal mobile communication terminal, and calling a called terminal via a public switched telephone network (PSTN) 10.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether claims 21 through 26, 28 through 33, 35 and 36 were improperly rejected under 35 U.S.C. §103(a) as being obvious, and thus unpatentable over the Examiner's proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465.

VII. ARGUMENT

Rejection of Independent Claims 21 and 30

The Examiner's proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465, fails to make a *prima facie* showing of obviousness

In rejecting independent claim 21, on page 3 of the Office action of 4 March 2008 (Paper No. 20080227), the Examiner alleges that Cyr '055 discloses (at column 2, lines 3-8) a private base station transceiver system (pBTS). Whereas the cited portion of Cyr '055 discusses a wireless base station, the discussion is general in nature and is simply too superficial to be applied to the subject matter of claims 21 and 30 because, among other deficiencies in the Examiner's proposed combination, such a wireless base station is not shown in Figure 1 of the Examiner's proposed combination incorporating the Cyr '055 patent. That is to say, despite the citation of column 2, lines 3-8 of Cyr '055 (appearing on page 3 of the Office action), there is no disclosure or suggestion in Cyr '055, and there is no disclosure or suggestion in Figure 1 thereof, of a private base station transceiver system as recited in independent claim 21. Bedingfield *et al.*, '055 does not remedy this deficiency in the proposed combination. Consequently, the Examiner's proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465, fails to make a *prima facie* showing of obviousness.

In the latter regard, it should be noted that independent claim 30 also recites, in the first step of the method, a private base station transceiver system (pBTS). Thus, this distinction over the Examiner's proposed combination by independent claim 21, also applies to independent claim 30.

On page 4 of the Office action, in connection with the rejection of independent claim 21, the Examiner admits that Cyr '055,

“fails specifically to teach an assignment of respective virtual wired phone numbers” (emphases in original).

In Paper No. 20080227, the Examiner further admits that the primary reference, Cyr '055 does not disclose the subject matter contained in the last paragraph of independent claim 21 (*see* page 4, lines 4-8 of the Office action). Therefore, the Examiner cites Bedingfield *et al.* '465 as allegedly teaching “the establishment and usage [of] virtual telephone number in a wired and wireless system” (quoting from page 4, lines 9-11 of the Office action). In that regard, the Examiner cites paragraphs [0017], [0037]-[0040], [0045]-[0048] and [0055] of Bedingfield *et al.* '465.

A thorough review of the proposed combination incorporating the paragraphs of Bedingfield *et al.* '465 cited in Paper No. 20080227 however, does not reveal a disclosure or suggestion of the subject matter recited in the last paragraph of independent claim 21. That is to say, the proposed combination incorporating Bedingfield *et al.* '465, does not disclose or suggest that, when receiving a request for an outgoing service from an internal mobile communication terminal, the group exchange changes a caller identification (CID) into the virtual wired phone number assigned to the internal mobile communication terminal, and calls a called terminal via the PSTN, as recited in the last paragraph of independent claim 20. Thus, the invention recited in independent claim 20 is further distinguishable from the prior art on this basis.

In the latter regard, it should be noted that the last paragraph of independent claim 21 corresponds to the last paragraph of independent claim 30. Thus, the prior art cited by the Examiner also does not disclose or suggest the subject matter recited in the last paragraph of independent claim 30. Therefore, the invention recited in independent claim 30 is also distinguishable from the prior art on that basis.

For the above reasons, it is submitted that the invention recited in independent claims 21 and 30 is distinguishable from the cited prior art so as to preclude rejection under 35 U.S.C. §103(a).

Rejection of Dependent Claim 26

Dependent claim 26 further distinguishes the invention from the prior art by virtue of the recitation of the group exchange being connected to the PSTN through No. 7 signaling. In that regard, on pages 6 and 7 of the Office action, the Examiner alleges that Bedingfield *et al.* '465 "teaches connection between PSTN and No. 7" (quoting from page 7, line 1 of the Office action). Initially, it should be noted that dependent claim 26 does not recite a connection between a PSTN and No. 7 signaling, as alleged by the Examiner, but rather recites that the group exchange is connected to the PSTN through No. 7 signaling.

In addition, in support of the allegation contained at page 7, line 1 of the Office action, the Examiner cites "items 36, 38 and 46 in FIG. 2" (quoting from page 7, line 2 of the Office action). In Figure 2 of Bedingfield *et al.* '465 however, element 36 is a service switching point (SSP),

element 38 is a service control point (SCP), and element 46 is a public switched telephone network (PSTN). These elements are discussed in paragraph [0035] of Bedingfield *et al.* '465, but neither Figure 2 nor that paragraph of the cited patent discloses or suggests a connection between a group exchange and a PSTN accomplished through No. 7 signaling. Thus, dependent claim 26 further distinguishes the invention from the cited prior art so as to preclude rejection under 35 U.S.C. §103.

Rejection of Dependent Claim 28

Dependent claim 28 further distinguishes the invention from the cited prior art by reciting that, when receiving the request for the outgoing service from the internal mobile communication terminal, the pBSC checks a service type identifier defining which one of a private network service and a public network service the internal mobile communication terminal requests.

In the Office action, the Examiner alleges that Bedingfield *et al.* '465 teaches the above feature (*see* page 7, lines 7-20 of the Office action). The Examiner cites paragraph [0017] - [0018] of Bedingfield *et al.* '465. Bedingfield *et al.* '465 however, never mentions a private communication service or the public communication service as recited in claim 28, much less the functions recited in the claim. Therefore, it would not be obvious to one of ordinary skill in the art, upon reviewing the disclosure of Bedingfield *et al.* '465, to develop the feature of the invention recited in claim 28.

Furthermore, even if Bedingfield *et al.* '465 were to disclose a private communication service

or a public communication service, the network selecting mechanism of the present invention is different from any mechanism of the disclosure of Bedingfield *et al.* '465. Specifically, as recited in claim 28 of the present application, the pBSC checks a service type identifier of a request for an outgoing service from an internal mobile communication terminal, and defines which one of a private communication service and a public communication service the internal mobile communication terminal requests. Thus, the use of the present invention is able to select the network easily. In contrast, in Bedingfield *et al.* '465, it is difficult for the user to modify the information, and thus the user can not select a network easily.

Rejection of Dependent Claim 29

Dependent claim 29 further distinguishes the invention from the cited prior art by virtue of its recitation of the pBSC relaying an outgoing call to the group exchange when the internal mobile communication terminal requests the private network service, and relaying the outgoing call to a public land mobile network (PLMN) when the internal mobile communication terminal requests the public network service. In the latter regard, on page 8 of the Office action, Paper No. 20080227, the Examiner alleges that Cyr '055 discloses (at column 4, line 59-column 5, line 7 thereof) such a feature of the invention.

A careful reading of the proposed combination incorporating Cyr '055, as interpreted in the text of Paper No. 20080227, reveals that the cited portion of Cyr '055, (that is, column 4, line 59 - column 5, line 7 of Cyr '055) discusses the handling of an *incoming* call, rather than handling of

an *outgoing* call. This distinction is substantial because, with an *incoming* call, the external network and routing of that network, is already established as of the instant in time when the *incoming* call is received. Consequently, Appellant's technique for (i) the pBSC relaying an outgoing call to the group exchange when the internal mobile communication terminal requests the private network service, and (ii) relaying the outgoing call to a public land mobile network (PLMN) when the internal mobile communication terminal requests the public network service, are neither necessary nor invoked in the practice of the Examiner's proposed combination of proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465. Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465, thus fails to make a *prima facie* showing of obviousness..

Thus, the cited portion of Cyr '055 is not at all pertinent to the recitation of dependent claim 29, which concerns the handling of an outgoing call. Finally, neither Cyr '055 nor Bedingfield *et al.* '465 discuss at all, or even mention, a public land mobile network (PLMN). Thus, there is no disclosure or suggestion in Cyr '055 or in Bedingfield *et al.* '465 of the use of a PLMN, as recited in dependent claim 29. For these reasons, dependent claim 29 further distinguishes the invention from the cited prior art so as to preclude rejection under 35 U.S.C. §103(a).

Rejection of Dependent Claim 33

Dependent claim 33 further distinguishes the invention from the cited prior art by virtue of the recitation of a the step of rerouting, by the group exchange, an incoming call to one of a public switch telephone network (PSTN) and a public land mobile network (PLMN) when the called wired

terminal and the mobile communication terminal make no response. In that regard, on page 10 of the Office action, the Examiner alleges that Cyr '055 discloses such a feature, the Examiner citing column 3, lines 20-61 of the patent. However, the cited portion of Cyr '055 (column 3, lines 20-61) does not at all concern the situation where a called wired terminal and a mobile communication terminal make no response to an incoming call. Thus, the citation of that portion of Cyr '055 is not at all relevant to the feature of the invention recited in dependent claim 33.

Finally, neither Cyr '055 nor Bedingfield *et al.* '465 discuss at all, or even mention, a public land mobile network (PLMN). Thus, there is no disclosure or suggestion in Cyr '055 or in Bedingfield *et al.* '465 of the use of a PLMN, as recited in dependent claim 33.

For the above reasons, dependent claim 33 further distinguishes the invention from the cited prior art so as to preclude rejection under 35 U.S.C. §103.

CONCLUSION

The proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465, fails to either teach or to suggest in Figure 1 thereof, Appellant's private base station transceiver system as defined by independent claims 21 and 30. Nothing in the secondary reference, Bedingfield *et al.*, '055, remedies this deficiency in the proposed combination. Consequently, the proposed combination of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No.

2004/0110465, fails to make a *prima facie* showing of obviousness.

To summarize, Cyr '055, both alone and in combination with Bedingfield *et al.* '465, fails to disclose or suggest all of the elements recited in independent claims 21 and 30, as well as the further features of the invention recited in dependent claims 26, 29 and 33. Therefore, a rejection under 35 U.S.C. §103 is clearly inappropriate. In short, the various proposed combinations of Cyr, U.S. Patent No. 6,223,055, modified in view of Bedingfield *et al.*, U.S. Patent Publication No. 2004/0110465, that are set forth in Paper No. 20080227, fail to make a *prima facie* showing of obviousness.

Moreover, there is no disclosure within the “four corners” of Cyr '055, and the Examiner has not cited any such disclosure, which would have motivated a person of ordinary skill in the art, as of the date of the invention, to obtain and review the disclosure of Bedingfield *et al.* '465, and to incorporate any features found with of Bedingfield *et al.* '465, into a modification of the disclosure of Cyr '055. For this additional reason, a rejection under 35 U.S.C. §103(a) is clearly inappropriate.

The Board is respectfully requested to consider that Appellant's claims 21, 26, 29, 30 and 33 are not the type of claims found in *KSR Int'l Co. v. Teleflex Inc.*¹ where every element, that is, both the electrical switch and the brake petal assembly, were standard off-the-shelf items that had been previously used in the same industry, for the same purpose, for many years, to achieve the same result. In *KSR*, neither the claim when read in its entirety, nor the two paragraphs that defined the switch and assembly, did anything more. Consequently, and in conformance with the precedential

¹ *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 1, 127 S.Ct. 1727, 1739, 82 USPQ2d @1395 (2007).

principles laid down by *Hotchkiss v. Greenwood*,² the Supreme Court affirmed its principle of the “functional approach” that “[t]he combination of familiar elements according to known method is likely to be obvious when it does no more than yield predictable results.”³

Here, and unlike *KSR*, the Examining staff has failed to show that the constituent elements of Applicant’s claims 21 and 30 has ever been known in the art, and has failed to show either the structure (namely, Applicant’s combinations of “private base station controller” and “group exchange” of claim 21, and steps of “assigning, by a group exchange , a respective virtual wired number”, “providing ... a wired phone service to a wired terminal ... a public wired phone service to the mobile communication ...” and responding to “a request for an outgoing service from an internal mobile communication terminal” and “changing, by the group exchange, a caller identification ...” or the results of seamless operation of “wired and wireless phone services interconnectivity” attained by these operational functions performed by this structure of claims 21 and 30 have ever existed in the art outside of Applicant’s specification.

The Board of Appeals is therefore respectfully urged to consider that the procedural standard established by 35 U.S.C. §103(a) requires that “the *differences* between the subject matter sought to be patented and the prior art” must be identified; that standard has not been met here where the Office action, Paper No. 20080227, has attributed to the Examiner’s proposed combination the nomenclature, operational functions and results attained by Appellant’s claims when these properties can not be found by a thorough reading of that proposed combination. To paraphrase the Board of

² *Hotchkiss v. Greenwood*, 11 Howard 248 (1851).

³ *Ex parte Mary Smith*, Appeal No. 2007-1925 (BPAI 2007).

Appeals, how may this art be said to teach these features of Appellant's claims when that art does not use the words of these claims.

Consequently, there is no *prima facie* showing of obviousness on the administrative record before the Office.

Moreover, the administrative record here demonstrates that the Examining staff did little more than summarily apply the nomenclature of Appellant's claims to different, incompatible constituent components of the Examiner's proposed combination, without stopping to consider that the applied art expressly taught that those elements in the proposed combinations attributes neither Appellant's structure, operational cooperation between Appellant's structure, and the results attained by that structure, to those constituent components of the proposed combination. In other words, Paper No. 20080227 is a compilation of conclusory statements drawn from the language of Appellant's claims, rather than from the written teachings of the Examiner's proposed combination.

The approach of Paper No. 20080227 of ascribing the nomenclature, operational cooperation, and attained results to the prior art is contrary to the procedural requirement of 35 U.S.C. §103(a) that consideration be given to the differences between the subject matter sought to be patented and the prior art; this "conclusory" approach to 35 U.S.C. §103(a) was condemned by the Supreme Court, and by recent implementations of policy by the Office:

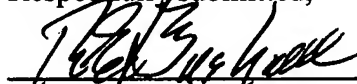
"The Court quoting *In re Kahn*, 441 F.3d 977, 988, 78 USPQ2d 1329, 1336 (Fed. Cir. 2006), stated that "[R]ejections on obviousness cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning

to support the legal conclusion of obviousness." *KSR*, 550 U.S. at 14,
82 USPQ2d at 1396.”⁴

Moreover, in applying the guidance given by the Supreme Court in *KSR*, the Board has reversed a rejection where the administrative record created by the prosecution history before the Board failed to show that constituent elements of the claim was in fact, conventional in the art. (“Further, the Examiner has not provided any evidence that it was conventional in the art to send details of the algorithm used for encryption to the authenticating entity.” *Ex Parte Owlett*, Appeal 20070644, Decided June 20, 2007.)

For these reasons, and in view of the law and facts stated herein, as well as all of the foregoing reasons, Appellants believe that the rejection is improper, and respectfully requests that the Board overrule the outstanding rejection of the claims under 35 U.S.C. §103(a).

Respectfully submitted,



Robert E. Bushnell,
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Date: 7/11/08
I.D.: REB/JGS

VIII. APPENDIX

CLAIMS UNDER APPEAL (21-26, 28-33, 35 and 36)

1 21. (Previously Presented) A system for operating wired and wireless phone services
2 interconnectively, the system comprising:

3 a private base station controller (pBSC) which is connected to a public switched telephone
4 network (PSTN) and a private base station transceiver system (pBTS), and which provides a mobile
5 communication service to a plurality of mobile communication terminals; and

6 a group exchange which is connected to the PSTN, and which assigns a respective virtual
7 wired phone number to each respective mobile communication terminal existing in a mobile zone
8 as a management region of the pBTS, and which provides a public wired phone service to said each
9 respective mobile communication terminal using the respective virtual wired phone number, and
10 which provides a wired phone service to a wired terminal existing outside the mobile zone;

11 wherein, when receiving a request for an outgoing service from an internal mobile
12 communication terminal, the group exchange changes a caller identification (CID) into the respective
13 virtual wired phone number assigned to the internal mobile communication terminal, and calls a
14 called terminal via the PSTN.

1 22. (Previously Presented) The system according to claim 21, wherein the group exchange
2 calls the mobile communication terminal corresponding to the respective virtual wired phone number
3 when receiving an incoming call containing the respective virtual wired phone number.

1 23. (Previously Presented) The system according to claim 21, wherein the group exchange
2 comprises a database for storing, for each arbitrary wired phone number, information indicating
3 whether or not said each arbitrary wired phone number is a virtual phone number and information
4 about whether or not a multiple terminating service is registered.

1 24. (Previously Presented) The system according to claim 23, wherein the group exchange
2 simultaneously calls a wired terminal corresponding to a wired phone number and a mobile
3 communication terminal when the wired phone number is registered with the multiple terminating
4 service and is called.

1 25. (Previously Presented) The system according to claim 21, wherein the pBSC comprises
2 a database for storing said each respective virtual wired phone number assigned to said each
3 respective mobile communication terminal and a mobile identifier number (MIN) of said each
4 mobile communication terminal to which said each respective virtual wired phone number is
5 assigned.

1 26. (Previously Presented) The system according to claim 21, wherein the group exchange
2 is connected to the PSTN through No. 7 signaling.

1 28. (Previously Presented) The system according to claim 21, wherein, when receiving the
2 request for the outgoing service from the internal mobile communication terminal, the pBSC checks

3 a service type identifier defining which one of a private network service and a public network service
4 the internal mobile communication terminal requests.

1 29. (Previously Presented) The system according to claim 28, wherein the pBSC relays an
2 outgoing call to the group exchange when the internal mobile communication terminal requests the
3 private network service, and relays the outgoing call to a public land mobile network (PLMN) when
4 the internal mobile communication terminal requests the public network service.

1 30. (Previously Presented) A method for operating wired and wireless phone services
2 interconnectively, the method comprising the steps of:

3 assigning, by a group exchange, a respective virtual wired phone number to each respective
4 one of a plurality of mobile communication terminals existing in a mobile zone as a management
5 region of a private base station transceiver system (pBTS);

6 providing, by the group exchange, a wired phone service to a wired terminal existing outside
7 the mobile zone;

8 providing, by the group exchange, a public wired phone service to the mobile communication
9 terminals by linking the respective virtual wired phone numbers with respective mobile identifier
10 numbers (MINs) of the mobile communication terminals; and

11 when the group exchange receives a request for an outgoing service from an internal mobile
12 communication terminal, changing, by the group exchange, a caller identification (CID) into the
13 respective virtual wired phone number assigned to the internal mobile communication terminal, and

calling a called terminal via a public switched telephone network (PSTN).

31. (Previously Presented) The method according to claim 30, wherein in the step of providing the public wired phone service, when the group exchange receives an incoming call containing a virtual wired phone number through a public switched telephone network (PSTN), the group exchange calls the respective mobile communication terminal to which the virtual wired phone number is assigned.

32. (Previously Presented) The method according to claim 30, further comprising the step of simultaneously calling, by the group exchange, a wired terminal corresponding to a wired phone number and a mobile communication terminal when the wired phone number is registered with the multiple terminating service and is called.

33. (Previously Presented) The method according to claim 32, further comprising the step of rerouting, by the group exchange, an incoming call to one of a public switched telephone network (PSTN) and a public land mobile network (PLMN) when the called wired terminal and the mobile communication terminal make no response.

35. (Previously Presented) The method according to claim 30, further comprising the step of, when a private base station controller (pBSC) receives a request for an internal service from an outgoing mobile communication terminal, checking, by the pBSC, a service type identifier defining

4 which one of a private network service and a public network service the internal mobile
5 communication terminal requests.

1 36. (Previously Presented) The method according to claim 35, further comprising the steps
2 of:

3 relaying, by the pBSC, an outgoing call to the group exchange when the internal mobile
4 communication terminal requests the private network service; and

5 relaying, by the pBSC, the outgoing call to a public land mobile network (PLMN) when the
6 internal mobile communication terminal requests the public network service.

IX. EVIDENCE APPENDIX

None.

X. RELATED PROCEEDINGS APPENDIX

None.